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REMARKS

Claims in the Application. Claims 1-18, 20-22, 24 and 37 have been cancelled from this application. Claims 19, 23, 25-26, 29-30, 33-34 and 38-40 have been amended. Claims 41-56 have been added to this application. Accordingly, Claims 19, 23, 25-36 and 38-56 are active in this application. Reconsideration is respectfully requested.

The Examiner's Rejection Over *Burdick*. The Examiner has also rejected Claims 1-4, 7-9 and 29 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,479,537 ("*Burdick*"). It is believed discussion of this rejection is unnecessary in light of cancellation of the rejected claims from this application.

The Examiner's Rejection Over *Korzilius*. The Examiner has rejected Claims 7-9 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,239,081 ("*Korzilius*"). It is believed discussion of this rejection is unnecessary in light of cancellation of the rejected claims from this application.

The Examiner's Rejection Over *Aqualon*. The Examiner has further rejected Claims 1-3 under 35 U.S.C. § 102(b) as being anticipated by European Patent Application No. 482 533 A2 ("*Aqualon*"). It is believed discussion of this rejection is unnecessary in light of cancellation of the rejected claims from this application.

The Examiner's Rejection Over *Burdick* and *Boatman*. The Examiner has further rejected Claims 1-4, 7-9, 12, 14, 15, 18, 19 and 21-40 under 35 U.S.C. § 103(a) as being unpatentable over *Burdick* in view of U.S. Patent No. 6,315,061 ("*Boatman*"). Claims 1-4, 7-9, 12, 14 and 15 have been cancelled from this application. The rejection of Claims 18, 19 and 21-40 is traversed.

The claims of Applicants, as now amended, are directed to use of a cellulosic suspension in either a completion or workover operation in order to thicken a targeted brine. The use of such thickened brines to prevent fluid loss is discussed in the first paragraph of page 2 of the originally filed specification. *Burdick* does not disclose a cellulosic suspension in a completion or workover operation.

Though the Examiner references discussion of *Boatman* in paragraph 9 of the Office Action, Applicants cannot locate in the Office Action any such discussion. Applicants presume, for purposes of argument herein, that the Examiner's basis for rejection of the claims over *Boatman* is as set forth in the previous Office Action. *Boatman*, however, is not directed to thickening of a brine during a completion or workover operation. In any event, *Boatman* uses a

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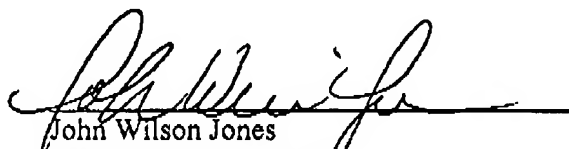
formate salt in order to adjust the density of a drilling fluid. In contrast to *Boatman*, Applicant uses the formate salt solution as a carrier fluid for the cellulosic polymer in order to thicken brine.

The Examiner's Double Patenting Rejection. The Examiner has further provisionally rejected Claims 7-12, 14-17 and 19-20 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over Claims 3-6 and 13 of copending Application No. 10/911,038. Applicant will consider the filing of a Terminal Disclaimer upon indication of allowable subject matter in this application.

Conclusion. In view of the foregoing amendment and remarks it is respectfully submitted that this application is in condition for allowance. Early notice to that effect is earnestly solicited.

Respectfully submitted,

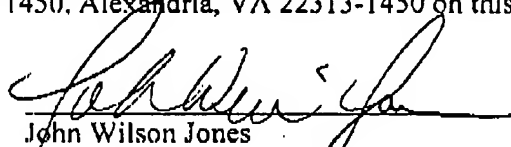
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I hereby certify that this correspondence is being transmitted by facsimile, 571 273-8300, to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 11th day of June 2007.


John Wilson Jones